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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

THE UNITED STATES OF AMERICA

V.

FERNANDA AYALA ZAMORA
LUIS HERNANDEZ-GUZMAN

Case Number: 20-CR-25 DJC

**STIPULATION AND ~~PROPOSED~~
ORDER FOR TRAVEL**

Plaintiff United States of America, by and through its counsel of record, and the
Defendant Fernanda Ayala Zamora, by and through each counsel of record, hereby stipulate as
follows:

1. Defendant Fernanda Ayala Zamora (hereafter “Defendant”) has requested
permission to travel to Mexico to visit her ailing grandmother from September 27, 2025-October
5, 2025;

2. I have communicated this request to her Pretrial Services Officer Taifa Gaskins,
and Assistant United States Attorney James Conolly. Based upon the Pretrial Services Office’s
assessment of the Defendant’s performance on pretrial release so far United States Attorney
James Conolly and Pretrial Services Officer Taifa Gaskins have stated that they have no

1 objection to this request based on Defendant's performance on pretrial release. Pretrial Services
2 notes that the defendant has remained in compliance with her conditions of release and that
3 Defendant has traveled to Mexico two previous times while on pretrial release and has done so
4 and returned each time without incident. Pretrial Services further indicates that Defendant has
5 been subject to drug testing since her release in 2020 and has never had a positive test.

6 3. The parties agree and stipulate:

7 a. United States Attorney James Conolly has stated that he has no objection to this
8 request based on Defendant's performance on pretrial release. Pretrial Services Officer Taifa
9 Gaskins has stated she also not object based upon the Government's agreement. Further, Pretrial
10 Services notes that the defendant has remained in compliance with her conditions of release;

11 b. That Defendant supply to Pretrial Services her itinerary, address of destination
12 and the telephone number of her destination at least five days before departure;

13 c. Defendant's attorney shall get her passport from the clerk's office and provide it
14 to Defendant before the commencement of travel. The passport shall be returned to Defendant's
15 attorney no more than three days after her return to be returned to the clerk's office.

16 d. Defendant's Condition of Release (PACER #18) shall be modified to delete condition
17 9 (requiring drug testing). Conditions 10 and 11 shall be renumbered as Conditions 9 and 10
18 respectively. The government does not object to these modifications to Defendant's Conditions
19 of Release.

20 e. Defendant's surety (her sister Graciela Ayala-Zamora) has been informed of, and
21 consents to both the travel authorization and the deletion of Special Condition of Release #9
22 (drug testing).
23
24
25

IT IS SO STIPULATED

Dated: September 17, 2025

Respectfully submitted

/s/ Olaf W. Hedberg

Olaf W. Hedberg
Attorney for Fernanda Jasmin Ayala Zamora

/s/James Conolly

James Conolly
Assistant United States Attorney

/s/
Graciela Ayala-Zamora
Surety

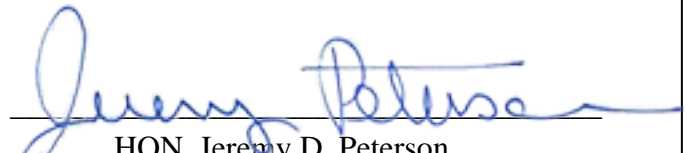
ORDER

HAVING CONSIDERED THE FOREGOING it is hereby ordered that Defendant Fernanda Ayala Zamora be permitted to travel to visit her ailing Grandmother in Mexico on/between the dates September 27, 2025 to October 5, 2025. Further, that her attorney Olaf Hedberg may obtain her passport from the clerk's office and give it to her prior to travel, and that she will return the passport to Attorney Hedberg within three days of her return so that Attorney Hedberg may return said passport to the clerk's office. Fernanda Ayala Zamora must provide her itinerary and phone numbers of her place of destination prior to departure.

Further, Special Condition of Release #9 shall be deleted and Special Conditions of Release numbers 10 and 11 shall be renumbered Special Conditions of Release numbers 9 and 10.

IT IS SO ORDERED.

Dated: September 18, 2025


HON. Jeremy D. Peterson
UNITED STATES MAGISTRATE JUDGE